

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re: Suzanne E. Leberman

Chapter 7

Debtor.

Case No. 10-32520-PP

MOTION TO DELAY DISCHARGE

The above-referenced Debtor, by the Law Offices of Rollie R. Hanson, S.C., brings this motion to Delay the Discharge while the Relief from Stay Motion on file in this case is being litigated in order to preserve the Automatic Stay for this Debtor. In support of this Motion, the Debtor respectfully shows to the court as follows:

- (1) The Debtor filed a Chapter 7 Bankruptcy on July 29, 2010.
- (2) A Relief from Stay Motion was filed on August 13, 2010 by Deutsche Bank National Trust Company, As Trustee for ABFC 2005-AQ1 Trust, Asset-Backed Certificates, Series 2005-AQ1 Trust (hereinafter "Movant").
- (3) Discovery in the form of the Debtor's First set of Interrogatories, Request for Documents, and Request for Admissions was sent to the Movant on October 18, 2010. The Debtor's Counsel is in communication with, and awaiting responses from, the Movant's Counsel in this case.

WHEREFORE, the Debtor respectfully requests that this Court delay the Debtor's discharge from her Chapter 7 bankruptcy until the Movant's Relief from Stay Motion is resolved so the Debtor does not lose the protection of the automatic stay while this matter is being litigated.

Dated at West Allis, Wisconsin this 12th day of November, 2010.

Law Office of Rollie R. Hanson, S.C.
6737 W. Washington Street, Suite 1420
West Allis, WI 53214
Telephone: (414)321-9733/Fax: (414)321-9601
Rollie@hansonlaw.net

/s/ *Rollie R. Hanson*

Rollie R. Hanson,
Attorney for Debtor

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NOTICE OF MOTION TO DELAY DISCHARGE

PLEASE TAKE NOTICE that the Debtor has filed a motion with the Court requesting that the Court delay her discharge in this Chapter 7 case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.

If you do not want the Court to enter an order granting the relief sought in the Motion to Delay Discharge, or if you want the Court to consider your views on the Motion to Delay Discharge then on or before **November 26, 2010** you or your attorney must:

File with the court a written objection to the Motion and request for a hearing with:

U.S. Bankruptcy Clerk
U.S. Courthouse, Room 126
517 East Wisconsin Avenue
Milwaukee, WI 53202

If you mail your response to the court for filing, you must mail it early enough so that the court will receive it on or before the date stated above. Further, any written objection must state specific grounds or reasons for the objection.

You must also mail a copy to:
The Law Office of Rollie R. Hanson S.C.
6737 W. Washington Street, Suite 1420
West Allis, WI 53214

THE LAW OFFICE OF ROLLIE R. HANSON, S.C.
6737 W. Washington Street, Suite 1420
West Allis, WI 53214
(414) 321-9733 Fax (414) 321-9601
Rollie@hansonlaw.net

If you or your attorney do not take these steps, the court may decide that you do not

oppose the Motion sought and may enter an order granting that relief.

Dated this 12th day of November, 2010 at West Allis, WI.

/s/ Rollie R. Hanson

Rollie R. Hanson
Attorney for Debtor.

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AFFIDAVIT OF SERVICE

STATE OF WISCONSIN)
 (SS
COUNTY OF MILWAUKEE)

Jared Nusbaum, being first duly sworn on oath, deposes and says that on November 12, 2010 he served via CM/ECF at West Allis, Wisconsin, a true and correct copy of the *Motion to Delay Discharge* to the parties of interest listed below:

Steven R. McDonald
Chapter 7 Trustee

Via CM/ECF

Office of the U.S. Trustee

ustpreion11.mi.ecf@usdoj.gov

Deutsche Bank National Trust Company
c/o M. Abigail O'Dess
O'Dess and Associates, S.C.
1414 Underwood Avenue, Suite 403
Wauwatosa, WI 53213

Via CM/ECF

/s/ Jared Nusbaum

Jared Nusbaum

Subscribed and sworn to before
me this 12th day of November, 2010.

/s/ Rollie R. Hanson

Rollie R. Hanson
Notary Public, State of Wisconsin
My Commission is permanent

LAW OFFICE OF ROLLIE R. HANSON, S.C.
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